

# **EXHIBIT C**

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THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

LEAPERS, INC.,  
(A Michigan Corporation),

Plaintiff,  
vs.

SMTS, LLC d/b/a TUFF ZONE,

(A Michigan Corporation);

TRARMS INC. (A California  
Corporation); and SUN OPTICS  
USA, (A Texas Corporation),

Defendants.

CIVIL ACTION NO.:  
2:14-CV-12290-RHC-DRG  
JUDGE ROBERT CLELAND  
MAG. JUDGE DAVID GRAND

\*\*CONFIDENTIAL\*\*

SMTS, LLC d/b/a TUFF ZONE, (A  
Michigan Corporation), TRARMS,  
INC., (A California Corporation),  
CHUANWEN SHI, a citizen of China,

Counter-Plaintiffs,

vs.

LEAPERS, INC., (A Michigan Corp),  
CONTINENTAL INCORPORATED, INC.,  
d/b/a CONTINENTAL ENTERPRISES,  
(an Indiana Corporation),

Counter-Defendants.

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2 DEPOSITION OF

3 LI WANG, a/k/a LISA WANG

4

5 DATE: March 19, 2015

6 TIME: 10:15 a.m.

7 LOCATION: FISHMAN STEWART YAMAGUCHI, PLLC

8 39533 Woodward Avenue, Suite 250

9 Bloomfield Hills, Michigan

10 REPORTED BY: Anne E. Vosburgh, CSR-6804, RPR, CRR

11 Litigation Services, 800.330.1112

12 JOB NO. 238678

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1 A P P E A R A N C E S:

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3

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14 FOR THE DEFENDANTS AND COUNTER-PLAINTIFFS TRARMS

15 AND TUFF Zone:

16

17 FISHMAN STEWART YAMAGUCHI

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1 APPEARANCES, CONTINUED:

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## 1                   I N D E X    T O    E X A M I N A T I O N S

2                   WITNESS:    LI WANG a/k/a LISA WANG

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4    EXAMINATION BY:

5                   MR. WASSOM:..... 7

6                   MR. LALONE:..... 113

7    RE-EXAMINATION BY:

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16		Answers to Plaintiff's	
17		Interrogatories	
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19		Supplemental Answers to	
20		Interrogatory Nos. 3, 4, and 7	
21	Exhibit 46	Tuff Zone - Cost Per Unit	85
22		(Accused Products Asserted in	
23		Complaint); A - D	
24	Exhibit 47	Email 4 September 2004 Email,	95
25		wuyang_optics to Lisa Wang	

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3 Exhibit 48 Images 102

4 Exhibit 49 Sales Information, Tuff Zone 103

5 Sales by Item Detail January 2012

6 through December 2014, three

7 pages; T29; TZ-4 through TZ-8,

8 TZ-10 through TZ-13, Images

9 Exhibit 50 Tuff Zone Sales by Item Detail 104

10 January 2012 through December

11 2014, TZ-14, pages 1 through 146

12 Exhibit 51 Tuff Zone Return List 6/2013; 106

13 TZ-16 through TZ-65

14 (EXHIBITS RETAINED.)

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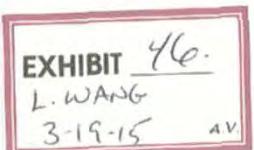
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**TUFF ZONE – COST PER UNIT**  
**(ACCUSED PRODUCTS ASSERTED IN COMPLAINT)**

PRODUCT	NET COST
TZLT-2632MAOL	\$31.40
TZLT-31240ML	\$50.90
TZLT-3932AOL	\$29.00
TZLT-3932L	\$25.75
TZLT-3932MAOL	\$31.40
TZLT-3940AOL	\$36.30
TZLT-3940L	\$28.00
TZLT-3940LR	\$34.40
TZLT-3950	\$29.90
TZLT-3950AOL	\$39.00
TZLT-3950L	\$29.90
TZLT-41640AOL	\$38.00
TZLT-41650AOL	\$47.00
TZLT-432MAOL	\$28.30
TZLT-432ML	\$16.50
TZLT-432SL	\$23.40
TZLT-440L	\$27.90

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TZLT-62450AOL	\$56.90
TZLT-632	\$16.00
TZLT-632LR	\$29.40
TZLT-632MAOL	\$28.30

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**TUFF ZONE – UNITS SOLD**  
**(ACCUSED PRODUCTS ASSERTED IN COMPLAINT)**

PRODUCT	UNITS
TZLT-1428L (1-4X28 Compact Size Scope, Red/Green/Blue Mil-Dot, 30mm Dia Tube. Lo...)	86
TZLT-2632MAOL (2-6X32 Compact Scope w/ Adjustable Objective, Red and Green Reticl...)	130
TZLT-31240ML (3-12x40 Compact Size Scope. 1" Dia., Red/Green Sharp Mil-Dot Reticl...)	499
TZLT-3932AOL (3-9X32 Full Size Scope. 1" Dia. Adjustable AO, Red/Green/Blue Mil-D...)	86
TZLT-3932L (3-9X32 Full Size Scope, 1" Dia, Red&Green Mil-Dot. Rings Included)	24
TZLT-3932MAOL (3-9x32 Compact Size Scope. 1" Dia., Adjustable AO, Red/Green Sharp...)	242
TZLT-3940AOL (3-9X40 Full Size Scope. 1" Dia. Adjustable AO, Red/Green/Blue Mil-D...)	189
TZLT-3940L (3-9X40 Full Size Scope, 1" Dia, Red&Green Mil-Dot. Rings Included)	22
TZLT-3940LR (3-9X40 Full Size Rubberized Scope. 1" Dia. Red/Green Sharp Mil-Dot R...)	37
TZLT-3950 (3-9X50 Full Size Scope. 1" Dia. Locking Turret. Rings Included )	151
TZLT-3950AOL (3-9X50 Full Size Scope. 1" Dia. Adjustable AO, Red/Green/Blue Mil-D...)	81
TZLT-3950L (3-9X50 Full Size Scope. 1" Dia. Red/Green/Blue Sharp Mil-Dot Reticle....)	176
TZLT-41640AOL (4-16X40 Full Size Scope. 1" Dia. Adjustable AO, Red/Green/Blue Mil...)	113
TZLT-41650AOL (4-16X50 Full Size Scope. 1" Dia. Adjustable AO, Red/Green/Blue Mil...)	218
TZLT-420 (4x20 AR 15 Scope. Adapter Included. Red/Green Mil-dot Reticle. )	131
TZLT-420L (4x20 AR15 Scope w/ Light, Adapter Included. Red/ Green Mil-Dot Reticle)	15
TZLT-432 (4X32 Scope, Sharp Mil-Dot Reticle)	16
TZLT-432MAOL (4x32 Compact Size Scope. 1" Dia., Adjustable AO, Red/Green Sharp Mi...)	73
TZLT-432ML (4x32 Compact Size Scope. 1" Dia., Red/Green Sharp Mil-Dot Reticle.Rin...)	389
TZLT-432SL (4x32 Compact Size Scope. 1" Dia., Red/Green Sharp Mil-Dot Reticle.Rin...)	22
TZLT-440L (4X40 Full Size Scope, 1" Dia, Adjustable AO, Red/Green/Blue Mil-Dot Re...)	13
TZLT-62450AOL (6-24X50 Full Size Scope. 1" Dia. Adjustable AO, Red/Green/Blue Mil...)	271
TZLT-632 (6x32 Compact Size Scope, 1" Dia. Sharp Mil-Dot Reticle. Rings Included.)	819
TZLT-632LR (6X32 Rubberized Compact Scope. 1" Dia. Sharp Mil-Dot Reticle. Rings I...)	49
TZLT-632MAOL (6X32 Compact Size Scope, 1" Diameter, Adjustable AO, Red/Green Shar...)	63
<b>TOTAL</b>	<b>3,915</b>

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**TUFF ZONE – PRICE LIST**  
**(ACCUSED PRODUCTS ASSERTED IN COMPLAINT)**

<b>PRODUCT</b>	<b>SELLING PRICE</b>
TZLT-3950AOL	\$49.99
TZLT-3940AOL	\$47.99
TZLT-3950L	\$45.99
TZ-S394	\$42.99
TZLT-3950	\$39.99
TZLT-3932AOL	\$39.99
TZ-S39L	\$99.99
TZLT-62450AOL	\$69.99
TZLT-41640AOL	\$45.99
TZ-S312B	\$99.99
TZLT-3940LR	\$48.99
TZLT-440L	\$34.99
TZLT-41650AOL	\$59.99
TZLT-3940L	\$43.99
TZLT-3932L	\$38.99
TZLT-31240ML	\$59.99
TZLT-432MAOL	\$38.99
TZLT-3932MAOL	\$42.99
TZLT-432ML	\$35.99
TZ-SC39	\$42.99
TZLT-432SL	\$35.99
TZLT-632AML	\$38.99
TZ-SC39B	\$42.99
TZLT-632LR	\$39.99
TZLT-420	\$35.99
TZLT-632	\$20.99
TZLT-1428L	\$69.99
TZLT-2632MAOL	\$42.99

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